

unavailable on June 29; Defendant's counsel will be unavailable on June 29 and July 6.

4. Further, the requested extensions, if granted, would permit the parties to explore options for settlement before significant expenses are incurred by both parties.

5. Defendant respectfully requests that favorable consideration be given to this agreed motion to extend time for Defendant to answer or otherwise plead to July 12, 2006, and to reset the status hearing now scheduled for June 29, 2006 to July 12, 2006 or any date thereafter to be determined by the Court.

6. This motion is brought in good faith, not for purpose of delay, and will not prejudice any party.

7. On June 9, 2006, Plaintiff, through its counsel, agreed to this motion.

Respectively submitted,

By: /s/ Louis J. Alex
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Louis J. Alex, Registration No. 6274458
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Attorneys for Defendant

Dated: June 9, 2006

CERTIFICATE OF SERVICE

I, Louis J. Alex, an attorney, the undersigned attorney, hereby certify that on the 9th day of June, 2006, I served copies of the following documents upon counsel of record by the following means as indicated below:

1. Notice of Agreed Motion
2. Agreed Motion to Extend Time to Answer or Otherwise Plead in Response to Plaintiff's Complaint and to Reset Status Hearing Date

by ECF to the following:

Mark E. Wiemelt (mark@wiemeltlaw.com)

/s/ Louis J. Alex
Louis J. Alex